

Given that FCC rules on media ownership are presumed unnecessary unless proven otherwise, I understand the need to gather evidence that standing rules are needed, in the public interest, and in support of the FCC's stated goals: "to promote competition, diversity and localism in the media."

The vast changes in the ownership of radio stations nationwide since the 1996 Telecommunications Act offer extensive empirical evidence that a loosening of restrictions on media ownership in fact does lead to significant harm to the public interest. Americans' media options are clearly limited when multiple radio stations in their area change ownership from separate companies to one company broadcasting overlapping content, and when multiple radio stations nationwide operate with the same format broadcasting the same content across multiple stations in separate geographical areas. Diversity is limited when the number of possible employers for persons working in the broadcast field is significantly reduced, and when a small number of media companies blanket stations under their ownership with identical content from a small number of broadcast professionals. Competition is lessened when large media companies can eclipse the marketing budgets of other companies owning stations in individual markets, or buy their stations outright.

In the FCC's quest to find empirical evidence of the need to retain rules governing media ownership, I invite the Commission to study the effects of the 1996 Telecommunications Act on the media options and access to a diversity of viewpoints available to the American public.